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AREA CODE 216

October 15, 1979

John Rosenbaum, Esq.
Assistant Prosecutor
City of Elyria
City Hall Building
Broad Street
Elyria, OH 44035

Re: City of Elyria vs. Chemical Recovery, Inc.
Case No. 79 CR 1790

Dear Mr. Rosenbaum:

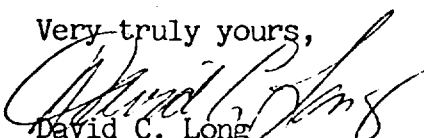
In reviewing the charges against the above-captioned defendant along with the summons and applicable regulations and your office's file in the matter, I feel the actual conduct of the defendant which constitutes a violation is not well defined. If I understand correctly, Inspector Howard of the Elyria Fire Department has been the investigative officer in this matter. Therefore, I feel he should be requested to prepare a report setting forth the actual alleged conduct giving rise to the charge. For this reason I have filed a Request for a Bill of Particulars.

It is my understanding that Mr. Bartha of the Elyria Health Department took some chemical samples from my client's premises. I would appreciate the opportunity to view any reports of analysis that might have been carried out.

Judge Nagy continued the matter for a period of ninety (90) days to allow further investigation by your office and mine. Pursuant to your request, I will have my secretary arrange for a time which is mutually convenient for both you and I to visit the defendant's plant and meet with Mr. Freeman, it's president.

Should you have any further questions regarding this matter please do not hesitate to contact my office. Thanking you for your usual cooperation, I am

Very truly yours,



David C. Long

DCL/ams

cc: Chemical Recovery, Inc.

IN THE ELYRIA MUNICIPAL COURT

LOBAIN COUNTY, OHIO

CITY OF ELYRIA, : CASE NO. 79 CR 1790
Plaintiff, :
-VS- : REQUEST FOR
CHEMICAL RECOVERY, INC., : BILL OF PARTICULARS
Defendant. :

Now comes the Defendant, by and through its attorney, and, pursuant to Criminal Rule 5(E), respectfully requests that the Prosecuting Attorney furnish Defendant's counsel with a Bill of Particulars setting forth specifically the nature of the offense charged and the conduct of Defendant alleged to constitute the offense.

DAVID C. LONG CO., L.P.A.

BY:

DAVID C. LONG,
Attorney for Defendant
300 Fourth Street
P.O. Box 427
Elyria, OH 44035
Tel. (216) 323-3331

PROOF OF SERVICE

This is to certify that a true and correct copy of the foregoing Request for Bill of Particulars was served personally upon the Elyria City Prosecutor's Office, City Hall Building, Elyria, Ohio, this _____ day of _____, 1979.

DAVID C. LONG,
Attorney for Defendant